

EXHIBIT A

Case Information

ADCOCK VS PILOT TRAVEL CENTERS LLC et al

23-C-05744-S5

Location	Case Category	Case Type	Case Filed Date
Gwinnett - State Court	Civil	Tort - General*	8/11/2023
Judge	Case Status		
Dove, Erica K.	Open (Pending)		

Parties4

Type	Name	Nickname/Alias	Attorneys
Plaintiff	EDDIE ADCOCK		CHARLES T DAY, IV
Defendant	PILOT TRAVEL CENTERS LLC		Pro Se
Defendant	PFJ SOUTHEAST LLC		Pro Se
Defendant	ELVIS JONES		Pro Se

Events11

Date	Event	Type	Comments	Documents
8/11/2023	Filing	General Civil/Dom Relations Case Filing Form		General Civil/Dom Relations Case Filing Form.pdf
8/11/2023	Filing	Summons		PFJ Summons - Eddie Adcock.pdf
8/11/2023	Filing	Summons		Elvis Jones Summons - Eddie Adcock.pdf
8/11/2023	Filing	Complaint with Jury Demand		Final Complaint - Eddie Adcock.pdf
8/11/2023	Filing	Interrogatories		Final Discovery - Eddie Adcock.pdf
8/11/2023	Filing	Summons	NOT SIGNED	Summons Pilot - Eddie Adcock.pdf
8/14/2023	Filing	Summons		Summons.tif
8/21/2023	Filing	Sheriff/Marshall's Service	PFJ Southeast LLC	Sheriffs Entry of Service.tif
8/21/2023	Filing	Sheriff/Marshall's Service	Pilot Travel Centers LLC	Sheriffs Entry of Service.tif
8/28/2023	Filing	Sheriff/Marshall's Service	Elvis Jones	Sheriffs Entry of Service.tif
9/11/2023	Filing	Affidavit of Service	Elvis J Jones by Cobb County Sheriff	Affidavit of Service Elvis Jones - Eddie Adcock.pdf

General Civil and Domestic Relations Case Filing Information Form

23-C-05744-S5

8/11/2023 12:29 PM

TIANA P. GARNER, CLERK

☐ Superior or ☒ State Court of Gwinnett State Court County

For Clerk Use Only

Date Filed _____
MM-DD-YYYYCase Number 23-C-05744-S5

Plaintiff(s)

Adcock, Eddie

Last First Middle I. Suffix Prefix

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Last First Middle I. Suffix Prefix

Defendant(s)

Pilot Travel Centers, LLC d/b/a Pilot Store #66

Last First Middle I. Suffix Prefix

PFJ Southeast LLC d/b/a Pilot Store #66

Last First Middle I. Suffix Prefix

Jones, Elvis

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Plaintiff's Attorney Charles Thomas DayState Bar Number 647636Self-Represented ☐

Check one case type and one sub-type in the same box (if a sub-type applies):

General Civil Cases

- ☐ Automobile Tort
- ☐ Civil Appeal
- ☐ Contempt/Modification/Other Post-Judgment
- ☐ Contract
- ☐ Garnishment
- ☒ General Tort
- ☐ Habeas Corpus
- ☐ Injunction/Mandamus/Other Writ
- ☐ Landlord/Tenant
- ☐ Medical Malpractice Tort
- ☐ Product Liability Tort
- ☐ Real Property
- ☐ Restraining Petition
- ☐ Other General Civil

Domestic Relations Cases

- ☐ Adoption
- ☐ Contempt
- ☐ Non-payment of child support, medical support, or alimony
- ☐ Dissolution/Divorce/Separate Maintenance/Alimony
- ☐ Family Violence Petition
- ☐ Modification
- ☐ Custody/Parenting Time/Visitation
- ☐ Paternity/Legitimation
- ☐ Support – IV-D
- ☐ Support – Private (non-IV-D)
- ☐ Other Domestic Relations

- ☐ Check if the action is related to another action pending or previously pending in this court involving some or all of the same: parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in OCGA § 9-11-7.1.

- ☐ Is a foreign language or sign-language interpreter needed in this case? If so, provide the language(s) required.

Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

**IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA**

EDDIE ADCOCK,

Plaintiff,

vs.

PILOT TRAVEL CENTERS, LLC d/b/a Pilot
Store #66, PFJ SOUTHEAST LLC, d/b/a
Pilot Store #66, and
ELVIS JONES,

Defendants,

Civil Action File No.:

23-C-05744-S5

SUMMONS

TO: PFJ SOUTHEAST LLC d/b/a Pilot Store #66
c/o C T Corporation System
289 S. Culver Street
Lawrenceville, GA 30046

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

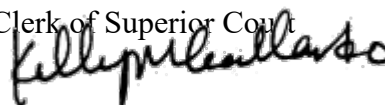
Charles Day
Athens Personal Injury Attorney, LLC
1120 Mars Hill Road
Suite 8
Watkinsville, GA 30677

an answer to the complaint and discovery which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 11th day of August, 2023.

Tiana P. Garner

Clerk of Superior Court



Deputy Clerk

**IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA**

EDDIE ADCOCK,

Plaintiff,

vs.

PILOT TRAVEL CENTERS, LLC d/b/a Pilot
Store #66, PFJ SOUTHEAST LLC, d/b/a
Pilot Store #66, and
ELVIS JONES,

Defendants,

Civil Action File No.:

23-C-05744-S5

SUMMONS

TO: **ELVIS JONES**
1836 Roswell Street SE
Apt. 10401
Smyrna, GA 30080

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Charles Day
Athens Personal Injury Attorney, LLC
1120 Mars Hill Road
Suite 8
Watkinsville, GA 30677

an answer to the complaint and discovery which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 11th day of August, 2023.

Tiana P. Garner

Clerk of Superior Court



Deputy Clerk

**IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA**

EDDIE ADCOCK,

Plaintiff,

vs.

PILOT TRAVEL CENTERS, LLC d/b/a Pilot
Store #66, PFJ SOUTHEAST LLC, d/b/a
Pilot Store #66, and
ELVIS JONES,

Defendants,

Civil Action File No.:

23-C-05744-S5

COMPLAINT FOR PERSONAL INJURY

COMES NOW, Plaintiff Eddie Adcock, and files her Complaint for Damages against the Defendants, Pilot Travel Centers LLC, PFJ Southeast LLC, and Elvis Jones as follows:

1.

Defendant Pilot Travel Centers LLC d/b/a Pilot Store #66, hereinafter “Defendant Pilot”, is a Delaware corporation that is registered to do business in this State, which may be served by service of process upon its registered agent, CT Corporation System, 289 S. Culver St., Lawrenceville, GA 30046-4805, Gwinnett County, Georgia. Defendant Pilot Travel Centers, LLC is subject to the jurisdiction and venue of this Court.

2.

Defendant PFJ Southeast LLC, d/b/a Pilot Store #66, hereinafter “Defendant PFJ”, is a Delaware corporation that is registered to do business in this State, which may be served by service of process upon its registered agent, C T Corporation System, 289 S. Culver St., Lawrenceville,

GA 30046-4805, Gwinnett County, Georgia. Defendant PFJ Southeast LLC is subject to the jurisdiction and venue of this Court.

3.

At all times relevant to this Complaint, Defendant Pilot and Defendant PFJ owned and/or operated a retail store open to the general public known as Pilot Store #66 located at 5888 Highway 53, Braselton, GA 30517.

4.

At all times relevant to this Complaint, Defendant Elvis Jones, hereinafter “Defendant Jones”, was the manager of Pilot Store #66 and was employed by Defendant Pilot and/or Defendant PFJ. As the manager, Defendant Elvis was the agent of Defendant Pilot and/or Defendant PFJ who was responsible for the maintenance and upkeep of the Pilot Store #66 located at 5888 Highway 53, Braselton, GA 30517. Defendant Jones resides at 1836 Roswell Street SE, Apt. 10401, Smyrna, GA 30080, Cobb County, Georgia. Defendant Jones will be served at this address and is subject to the jurisdiction and venue of this Court.

5.

At all times relevant to the Complaint, Defendant Jones was acting as the employee and/or agent of Defendant Pilot and/or Defendant PFJ in the scope and course of his duties under his employment with these Defendants. Accordingly, Defendant Pilot and/or Defendant PFJ are vicariously liable for any negligent acts or omissions of Defendant Jones.

6.

On or about August 29, 2021, Ms. Eddie Adcock (Plaintiff) visited the Pilot Store #66 as a customer and invitee. During her visit, she went into the women’s restroom. There were three stalls on the left side of the restroom. The first stall was occupied. The second and third stalls were

both empty but were locked. When the first stall became available, Ms. Adcock proceeded into the first stall.

7.

After using the restroom, but while still sitting on the toilet, Ms. Adcock began to stand up. As she stood up, she heard a loud sound, and water came rushing under the door from the stall next to her. In an attempt to remove herself from the situation, Ms. Adcock attempted to open the stall door to avoid the water, but the water under her feet caused her to slip and fall. As a result, Ms. Adcock fell to the ground, striking her head on the door handle and causing significant harm and injury.

8.

At all times relevant, Defendants owed Plaintiff a duty to exercise ordinary care in keeping the premises and restrooms of Pilot Store #66 safe for invitees and customers.

9.

On or about August 29, 2021, Defendants breached their duty of ordinary care. Defendants' negligent acts and/or omissions include:

- a)** failing to exercise ordinary care in keeping the premises and restrooms safe;
- b)** failing to develop and/or follow adequate policies and procedures to inspect the premises of the Pilot Store for hazardous conditions;
- c)** failing to remove hazardous conditions or properly warn invitees of the hazardous conditions despite having superior actual or constructive knowledge of the hazardous condition;
- d)** failing to exercise good judgment regarding the implementation of measures to keep patrons safe.

10.

At all times relevant, Plaintiff was exercising ordinary care for her own safety.

11.

As a direct and proximate result of Defendants' negligent acts and/or omissions, Plaintiff sustained serious and permanent bodily injury requiring medical treatment and resulting in medical expenses. Plaintiff's injuries include but are not limited to a large gash to her forehead, resulting in numerous stitches and scarring, a subdural hematoma, a brain bleed, right eye hemorrhaging, an injury to her tooth, right foot and right toe swelling, headaches, and a right hip injury. These injuries have resulted in extensive treatment, and Ms. Adcock has incurred at least \$33,467.78 in medical expenses to date. Her medical bills continue to accrue.

12.

As a direct and proximate result of Defendants' negligent acts and/or omissions, Plaintiff suffered general damages for pain, suffering, mental anguish, and loss of enjoyment of life in an amount to be determined by the enlightened consciousness of the jury.

13.

Defendants have acted in bad faith, been stubbornly litigious, and/or have caused Plaintiff unnecessary trouble and expense, and, as such, Plaintiff is entitled to recover attorney's fees and expenses of litigation pursuant to O.C.G.A. § 13-6-11.

14.

Plaintiff is entitled to recover damages from the Defendants for her medical expenses and other actual damages to the extent permitted by the law. She is also entitled to recover damages for her past, present, and future pain and suffering stemming from her injuries and resulting treatment.

WHEREFORE, Plaintiff prays for the following:

- a) that she have a trial by jury;

- b) that summons issue as required by law;
- c) that she have a judgment against Defendants for her medical expenses and those expenses to be reasonably incurred in the future;
- d) That she have judgment against the Defendants for her bodily injury and pain and suffering in amount to be determined by a jury to be adequate and just;
- e) that all attorney's fees, expenses, and costs of this action be assessed against the Defendants; and,
- f) that the Court grant such other and further relief as is deemed appropriate.

This 11th day of August, 2023.

Respectfully submitted,

/s/ Charles T. Day, IV
Charles T. "Chad" Day, IV
Georgia State Bar No.: 647636
Attorney for Plaintiff

Athens Personal Injury Attorney, LLC
1120 Mars Hill Road
Suite 8
Watkinsville, GA 30677
Phone: (706) 425-4500
Fax: (706) 310-8449
Email: chad@athenspi.com

SERVICE INSTRUCTIONS

**PLEASE HAVE THE SHERIFF OF GWINNETT COUNTY SERVE THE DEFENDANT AS
SOON AS POSSIBLE:**

Pilot Travel Centers, LLC, by and through its registered agent
CT Corporation System, Registered Agent
289 S Culver St.
Lawrenceville, GA 30046-4805

**PLEASE HAVE THE SHERIFF OF GWINNETT COUNTY SERVE THE DEFENDANT AS
SOON AS POSSIBLE:**

PFJ Southeast LLC, by and through its registered agent
CT Corporation System, Registered Agent
289 S Culver St.
Lawrenceville, GA 30046-4805

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

EDDIE ADCOCK,

Plaintiff,

vs.

PILOT TRAVEL CENTERS, LLC d/b/a Pilot
Store #66, PFJ SOUTHEAST LLC, d/b/a
Pilot Store #66, and
ELVIS JONES,

Defendants,

Civil Action File No.:

23-C-05744-S5

**PLAINTIFF'S REQUESTS FOR ADMISSIONS, FIRST CONTINUING
INTERROGATORIES, AND REQUEST FOR PRODUCTION OF DOCUMENTS TO
ALL DEFENDANTS**

You are hereby requested, pursuant to Section 26 and 33 of the Georgia Civil Practice Act (O.C.G.A. § 9-11-26 and O.C.G.A. § 9-11-33), to answer the following continuing Interrogatories separately, fully, in writing and under oath and to serve same upon **counsel for Plaintiff, Charles T. "Chad" Day, IV, Esq., Athens Personal Injury Attorney, LLC, 1120 Mars Hill Road, Suite 8, Watkinsville, GA 30677, (706) 425-4500**, within forty-five (45) days of service pursuant to O.C.G.A. § 9-11-33.

NOTE A: When used in these Interrogatories, the term Defendants or any synonym thereof is intended to and shall embrace and include, in addition to said Defendants, all agents, servants, representatives, private investigators and others who are in a position of or may have obtained information for or on behalf of Defendants.

NOTE B: These Interrogatories shall be deemed continuing so as to require supplemental answers if you or your attorneys obtain further information between the time answers are served

and the time of trial. Any such supplementary answers are to be filed and served upon Counsel for Plaintiff within thirty (30) days from receipt of such additional information, but not later than the time of trial.

NOTE C: Option to produce business records. Where the answer to an Interrogatory may be derived or ascertained from the business records of the party upon whom the Interrogatory has been served or from an examination, audit, or inspection of such business records, or from a compilation, abstract, or summary based thereon, and the burden of deriving or ascertaining the answer is substantially the same for the party serving the Interrogatory as for the party served, it is a sufficient answer to the Interrogatory to specify the records from which the answer may be derived or ascertained and to afford to the party serving the Interrogatory, reasonable opportunity to examine, audit, or inspect such records and to make copies, compilation, abstracts, or summaries.

DEFINITIONS

1. "Document" means every writing or record of every type and description that is or has been in your possession, custody, or control or of which you have knowledge, including but not limited to correspondence, memoranda, tapes, stenographic or handwritten notes, studies, publications, books, pamphlets, pictures, drawings and photographs, films, microfilms, voice recordings, maps, reports, surveys, minutes or statistical compilations, or any other reported or graphic material in whatever form, including copies, drafts, and reproductions. "Document" also refers to any other data compilations from which information can be obtained and translated, if necessary, by you through computers or detection devices into reasonably usable form.

2. "Person" means any natural person, corporation, partnership, proprietorship, association, governmental entity, agency, group, organization, or group of persons.

3. To "identify" a "document" means to provide the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- (a) The title or other means of identification of each such document;
- (b) The date of each such document;
- (c) The author of each such document;
- (d) The recipient or recipients of each such document, including but not limited to, Defendant or anyone who purports to represent the Defendant;
- (e) The present location of any and all copies of each such document in the care, custody, or control of Defendant;
- (f) The names and current addresses of any and all persons who have custody or control of each such document or copies thereof; and
- (g) If all copies of the document have been destroyed, the names, telephone numbers and current addresses of the person or persons authorizing the destruction of the document and the date the document was destroyed.

4. To "identify" a natural person means to state that person's full name, title, or affiliation and last known address and telephone number. To "identify" a person that is a business, organization, or group of persons, means to state the full name of such business, organization, or group of persons (e.g., government agency, corporation, partnership, joint venture, etc.), and to "identify" the natural person who would have knowledge of the information sought by the Interrogatory.

5. "Complaint", "lawsuit" and "this legal action" refers to the Complaint filed by Plaintiff in this action.

6. Terms in the singular shall be deemed to include the plural and, terms in the plural

shall be deemed to include the singular.

REQUESTS FOR ADMISSIONS

1.

You have been correctly named in the present case insofar as the legal designation of your name is concerned.

2.

All Defendants have been properly served as a party Defendants.

3.

Service of process is sufficient with regard to all Defendants in this case.

4.

The State Court of Gwinnett County has jurisdiction over the subject matter of this case.

5.

The State Court of Gwinnett County has personal jurisdiction over all Defendants as party Defendants in this case.

6.

Venue is proper in the State Court of Gwinnett County.

7.

The Complaint states a claim upon which relief can be granted.

8.

Plaintiff has not failed to join a party under O.C.G.A. § 9-11-19.

9a.

At the time of the incident described in the Complaint, Defendant Jones was employed by Defendant Pilot Travel Centers LLC.

9b.

At the time of the incident described in the Complaint, Defendant Jones was employed by Defendant PFJ Southeast LLC.

10.

At the time of the incident described in the Complaint, Defendant Jones was the manager on duty at Pilot Store #66 located at 5888 Highway 53, Braselton, GA 30517, hereinafter referred to as “Subject Property”.

11a.

At the time of the incident described in the Complaint, Defendant Jones was working for Defendant Pilot Travel Centers LLC and was physically present at the Subject Property.

11b.

At the time of the incident described in the Complaint, Defendant Jones was working for Defendant PFJ Southeast LLC and was physically present at the Subject Property.

12.

As the manager on duty, Defendant Jones was responsible for the safety of invitees, such as Plaintiff, at the Subject Property.

13a.

At the time of the incident described in the Complaint, Defendant Pilot Travel Centers LLC owned the premises of the Subject Property.

13b.

At the time of the incident described in the Complaint, Defendant PFJ Southeast LLC owned the premises of the Subject Property.

14a.

At the time of the incident described in the Complaint, Defendant Pilot Travel Centers LLC operated the Subject Property.

14b.

At the time of the incident described in the Complaint, Defendant PFJ Southeast LLC operated the Subject Property.

15a.

At the time of the incident described in the Complaint, Defendant Pilot Travel Centers LLC managed the Subject Property.

15b.

At the time of the incident described in the Complaint, Defendant PFJ Southeast LLC managed the Subject Property.

16a.

At the time of the incident described in the Complaint, Defendant Pilot Travel Centers LLC was responsible for inspecting and/or maintaining the condition of the Subject Property.

16b.

At the time of the incident described in the Complaint, Defendant PFJ Southeast LLC was responsible for inspecting and/or maintaining the condition of the Subject Property.

17a.

Admit that Defendant Pilot Travel Centers LLC hired no other company, person, or business to assist with the training of its employees located at the Subject Property.

17b.

Admit that Defendant PFJ Southeast LLC hired no other company, person, or business to assist with the training of its employees located at the Subject Property.

18.

Admit that on the date of the incident, Plaintiff was an invitee at the Subject Property.

19.

Admit that on the date of the incident, Plaintiff slipped on water on the floor of the restroom at the Subject Property.

20.

Admit that on the date of the incident, Plaintiff hit her head on the door handle of the bathroom stall located in the restroom of the Subject Property.

21a.

Admit that Defendant Pilot Travel Centers LLC knew about the broken condition of the restrooms located at the Subject Property and, despite this knowledge, allowed invitees to use the restroom.

21b.

Admit that Defendant PFJ Southeast LLC knew about the broken condition of the restrooms located at the Subject Property and, despite this knowledge, allowed invitees to use the restroom.

22a.

Admit that on the date of the incident, Defendant Pilot Travel Centers LLC had a duty to ensure the Subject Property was safe from hazards for customers and invitees.

22b.

Admit that on the date of incident, Defendant PFJ Southeast LLC had a duty to ensure the Subject Property was safe from hazards for customers and invitees.

23a.

Admit that on the date of the incident, Defendant Pilot Travel Centers LLC breached its duty to Plaintiff to ensure the Subject Property was safe from hazards for its customers and invitees.

23b.

Admit that on the date of the incident, Defendant PFJ Southeast LLC breached its duty to Plaintiff to ensure the Subject Property was safe from hazards for its customers and invitees.

24.

Admit that on the date of incident, there was no caution sign or other warning given to invitees, including the Plaintiff, that any hazardous condition existed in the stall Plaintiff was using in the restroom.

25.

Admit that on the date of incident, there was no caution sign or other warning given to invitees, including the Plaintiff, that any hazardous condition existed anywhere in or around the restroom.

INTERROGATORIES

WITNESSES

1.

Please state the names, addresses, home telephone numbers, places of employment and present whereabouts of all witnesses known to you who either saw or claim they saw all or any part of the occurrence complained of in this action.

2.

Please state the names, addresses, home telephone numbers, places of employment and present whereabouts of all witnesses known to you who arrived at the scene immediately or shortly after the occurrence complained of in this action.

3.

Please state the names, addresses, home telephone numbers, places of employment and present whereabouts of all persons who have given written statements, mechanically recorded statements, or oral statements later reduced to writing to you, your attorney, your insurance carrier or anyone else to your knowledge concerning the facts and circumstances of the incident which is the subject matter of this litigation. For each statement listed, please include the date such statement was made and to whom it was given.

4.

Please list the names, addresses, telephone numbers and current places of employment of any person who may have relevant knowledge or information of the facts surrounding the incident complained of in this lawsuit, or facts supporting the defenses being asserted by the Defendants.

5.

Please list the name, address, and job title of each person you expect to call as an expert witness at the trial of this case and, regarding any such expert, please state the subject matter and substance of the facts and opinions to which the expert is expected to testify.

6.

- a)** Please identify by name, address, title or position, and last known address/phone number each of Defendants' employees or agents who were on duty or present on the premises at any time on the date of the incident which is the subject matter of this lawsuit.
- b)** For each employee identified in (a), please state whether this person is still employed by Defendants, and if not, give the reason for their departure.

7.

Please identify the following:

- a)** Defendants' reason or explanation for the water that came rushing into Plaintiff's stall as described in the Complaint; and,
- b)** Whether Defendants' performed any work to remedy the leaking water in the bathroom either before or after Plaintiff's fall.

8.

Did the bathroom where this incident occurred have any history of plumbing problems, including but not limited to leaking pipes, toilets, etc.? If the answer is "yes," please identify the plumbing problems.

9.

Please identify by name, address and title or position each of Defendants' employees who were responsible for inspecting, sweeping, mopping, or cleaning the area of the fall described in the Complaint on the date of the incident which is the subject matter of this Complaint.

10.

Please state whether the Defendants have conducted an investigation into the facts and circumstances of this incident. If so, please describe the investigation and identify by whom the investigation was conducted.

11.

Please identify any employees of Defendants who were within sight of the area of Plaintiff's fall at the time/date of this incident.

12.

Please state the name and job title of the persons to whom Plaintiff reported this incident.

PHOTOS & VIDEOS

13.

Have any photographs been taken or made of the scene of the incident or any other matter related to this case? If so please describe each (or attach copies instead).

14.

- a) Was there a video or surveillance camera operating at the time of Plaintiff's fall which may have captured the incident?
- b) If so, does the video footage during the time of the incident still exist, whether in tangible or electronic form?

INSURANCE INFORMATION

15.

Please identify all liability insurance policies that may provide coverage for the claims set forth in the Complaint, including the limits of coverage.

16.

Please state whether Defendants have any medical payment benefits which may provide medical expense coverage for injuries at its place of business.

INFORMATION ABOUT THE FALL

17.

- a) Please state whether an accident or incident report was completed by Defendants or its employees or agents. If so, please identify by name, address, and title of the person who completed this report, and where the report is currently located.
- b) Does the report contain any alleged statements made by the Plaintiff?
- c) Is the report signed by the Plaintiff?

[In lieu of the above, please attach a copy of the report]

18.

- a) Please state the specific area of the Defendants' Pilot Store where the fall was reported to have occurred.
- b) If Plaintiff reported the fall to you, please describe in detail how Plaintiff described the fall and what reason Plaintiff gave, if any, as to the cause of the fall.
- c) If Defendants found any mats, rugs, or any other items or substances on the floor near the area of Plaintiff's fall, please identify the nature of the items/substances found, or what Defendant believes the items/substances to be, and how the items/substances arrived on the floor.

19.

Please state whether any evidence of the above-described items/substances were kept by Defendants, including, but not limited to, photographs, sample, etc.

20.

Please state what happened to the mats, rugs, or other substances or items described above after the Plaintiff's fall. If it was removed or cleaned up, please identify the name and job title of the employee or person who cleaned or removed this substance.

21.

Please state with particularity when the above-described items/substances were removed from Defendants' premises after the Plaintiff's fall and how long these items/substances were on Defendants' floor before Plaintiff's fall.

22.

Please identify when the area of Plaintiff's fall was last inspected by the Defendants' employees, and whether a written record was kept of this inspection and procedure.

23.

- a) Please state whether Defendant knew of any problems with the plumbing or the water supply to the ladies' restroom at Store #66 before Plaintiff's fall. If yes, please state how.
- b) Please explain the source or describe how any water got on the floor of the restroom at Pilot Store #66 at the time of the incident.
- c) Please state whether any stalls in the ladies' restroom of Pilot Store #66 had been locked and/or taken out of service at the time of the incident.
- d) Please describe any repairs performed to the ladies' restroom of Pilot Store #66 within 12 months following the incident.
- e) Please describe any repairs performed to the ladies' restroom of Pilot Store #66

within 12 months prior to the incident.

24.

Please state whether any caution or warning signs, caution tape, or any other warnings of a potential fall hazard were present at the time of this incident. If so, please identify the type of warnings, describe exactly where the warnings were located, and give the name and job title of the person who placed them.

MISCELLANEOUS

25.

Please identify any facts that you know of that would indicate Ms. Eddie Adcock was negligent in causing her fall described in the Complaint.

26.

Please briefly describe the Defendants' contentions about the cause of the accident that is the subject matter of this litigation.

27.

Please state whether disciplinary action was taken against any employee(s) or agent(s) as a result of Plaintiff's fall.

28.

For the previous 7 years before 8/29/2021, please identify any falls occurring in the ladies' restroom at Pilot Store #66 and give the following information:

- a)** Name, address, and phone number of the person(s) who fell;
- b)** Name, address and phone number of any attorney representing such person(s);
- c)** Brief description of how and where the fall happened;
- d)** Date of the incident;
- e)** Identify any witnesses to the incident by name, address, and phone number; and
- f)** Indicate if an incident report was completed and identify the person completing the incident

report.

- i) If a lawsuit was filed, please provide the caption, the court, and the date of filing.

29.

As of the date of Plaintiff's fall, please identify the exact legal name of the entity or entities who ***owned*** Pilot Store #66 (where Plaintiff's fall occurred).

30.

As of the date of Plaintiff's fall, please identify the exact legal name of all entities who had a part in ***operating*** Pilot Store #66 (where Plaintiff's fall occurred).

31.

As of the date of Plaintiff's fall, did Defendants use the services of any independent contractor to perform any maintenance, cleaning, sweeping, or inspection of the area where Plaintiff fell (including the plumbing, toilets, etc.)? If so, please identify the entity and explain their duties.

MULTIPLE DEFENDANTS

32.

- a) Please describe the legal, contractual or business relationship that existed between Defendant PILOT TRAVEL CENTERS, LLC, and, Defendant PFJ SOUTHEAST LLC as of the date of the incident, and describe any changes in that relationship from that time to the present date.
- b) As of the date of this incident, please identify the entity who employed Defendant Elvis Jones.

REQUEST FOR PRODUCTION OF DOCUMENTS

1.

Please produce any and all photographs, sketches, transparencies and/or drawings of any person, party, vehicle, roadway, scene, or any other object or thing relative to the incident referred to in the Complaint of this action and the subject matter thereof.

2.

Please produce any and all written recorded statements made by any witness, party or other person having relevant information or knowledge of any fact or circumstances in this action.

3.

Please produce any and all statements, if any, previously made by Plaintiff concerning this action or the subject matter of this action.

4.

Please produce copies of any and all accident or incident reports in the Defendant's possession relating to the incident which is the subject matter of this lawsuit.

5.

Please produce a true and correct copy of the cleaning, sweeping or inspection log or other such written notes kept by the Defendant about the condition of the premises, including the area of Plaintiff's fall, for the week in which this incident occurred.

6.

Please produce a true and correct copy of Defendants' policy and procedural manual in effect as of August 29, 2021, specifically including any safety manuals or policies relating to potential fall hazards anywhere in the store and inspection/safety of the restrooms.

7a.

Please produce any film, video, or recording of Plaintiff's fall and any film, video, or recording of Plaintiff at any time.

7b.

Please produce any and all surveillance footage from Pilot Store #66 that records Plaintiff at any time including but not limited to, Plaintiff entering and exiting Pilot Store #66 on the date of the incident.

8.

Please produce a blueprint or other sketch or drawing of the layout of the Defendants' place of business, including the area of Plaintiff's fall.

9.

Please produce any items or substances (or photos/videos thereof) that were found near the area of Plaintiff's fall that were kept by Defendant.

10.

Please produce a copy of the entire file of the expert(s) who have been retained or otherwise employed by Defendants in anticipation of litigation or preparation for trial in this action. (NOTE: The entire file includes but is not limited to any documents (i) used by or prepared by any expert retained by you for this case, (ii) that have been sent to and from you to said expert, and (iii) any documents concerning fee arrangements between you and the expert).

11.

Please produce any medical records in your possession relating to treatment received by Plaintiff. **(Prior to killing trees needlessly, please produce a copy of an index of records you have in your possession, which will allow Plaintiff to request copies of only those records not already in our possession.)**

12.

Please produce any and all correspondence, letters, or memos relating to the incident.

13.

Please produce any memos or notes made about the subject incident.

14.

Please produce any written evidence or documents in your possession showing any crimes, arrests, convictions, or charges made against the Plaintiff.

15.

Please produce any incident reports related to the claims identified in interrogatory number 28 (previous falls on Defendants' premises).

16.

Please produce any correspondence received from any individuals who claim to have fallen in any restroom at Pilot Store #66 during the 7 years prior to Plaintiff's fall. Please include any correspondences received from any attorneys representing these individuals.

17.

Please produce any document or report referring to the Plaintiff that was obtained through the Southeast Claims Index Bureau, or any other service that provides information on other incidents involving the Plaintiff.

18.

Please produce any document, photo, or report referring to the Plaintiff that was obtained through the use of surveillance, or any other attempt to observe the Plaintiff or the Plaintiff's activities.

19.

Please produce any document, records, reports, or other information referring to the Plaintiff that were obtained from any of Plaintiff's past or present employers.

20.

Please produce any other document not described above and identified in your responses to Plaintiff's First Interrogatories to Defendant.

21.

Please produce a copy of any contracts or other similar documents showing or explaining the ownership, use or operation of Defendant's place of business where Plaintiff's fall occurred.

22.

Please produce a copy of any contracts or similar documents showing or explaining the relationship between any Defendant and any other entity relating to the maintenance, repair, sweeping, cleaning and/or inspection of the area where Plaintiff fell.

23.

Please produce any contract or similar documents relating to any independent contractor identified in interrogatory number 31.

MULTIPLE DEFENDANTS

24.

Please produce a copy of any contracts or similar documents showing or explaining the business or contractual relationship between the Defendants as of the date of the incident.

This 11th day of August, 2023.

Respectfully submitted,

/s/ Charles T. Day, IV

Charles T. "Chad" Day, IV
Georgia State Bar No.: 647636
Attorney for Plaintiff

Athens Personal Injury Attorney, LLC
1120 Mars Hill Road
Suite 8
Watkinsville, GA 30677
Phone: (706) 425-4500
Fax: (706) 310-8449
Email: chad@athenspi.com

**IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA**

EDDIE ADCOCK,

Plaintiff,

vs.

PILOT TRAVEL CENTERS, LLC d/b/a Pilot
Store #66, PFJ SOUTHEAST LLC, d/b/a
Pilot Store #66, and
ELVIS JONES,

Defendants,

Civil Action File No.:

23-C-05744-S5

SUMMONS

TO: PILOT TRAVEL CENTERS, LLC d/b/a Pilot Store #66
c/o C T Corporation System
289 S. Culver Street
Lawrenceville, GA 30046

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Charles Day
Athens Personal Injury Attorney, LLC
1120 Mars Hill Road
Suite 8
Watkinsville, GA 30677

an answer to the complaint and discovery which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 11th day of August, 2023.

Tiana P. Garner
Clerk of Superior Court

Deputy Clerk

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

Eddie Adcock

Plaintiff

VS.

Pilot Travel Centers Llc

Defendant

Civil Action
Number 23-C-05744-S5

SUMMONS

TO THE ABOVE NAMED DEFENDANT: PILOT TRAVEL CENTERS LLC 285 S
CULVER ST. LAWRENCEVILLE GA 30046

FILED
CLERK OF SUPERIOR COURT
GWINNETT COUNTY, GA
2023 AUG 14 AM 8:31
TIANA P. GARNER, CLERK

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Charles T Day, Iv
Suite 8
1120 Mars Hill Rd
Watkinsville, GA 30677

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

This 14th day of August, 2023

Tiana P. Garner,
Clerk of Superior Court

By: Kellyn L. L. To
Deputy Clerk

INSTRUCTIONS: Attach addendum sheet for additional parties if needed, make notation on this sheet if addendum sheet is used.
SC-1 Rev. 2011

CIVIL ACTION NO. 23-C-05744-S6[] MAGISTRATE [X] STATE [] SUPERIOR - COURT
GWINNETT COUNTY, GEORGIADATE FILED 8/11/2023

ATTORNEY OR PLAINTIFF(S), ADDRESS & TELEPHONE NUMBER

Atticus Personal Injury Attorney, LLC
1120 Mans Hill Road, Suite 8
Watkinsville, GA 30677
Attorney Chad Day

NAME, ADDRESS & TELEPHONE # OF PARTY TO BE SERVED

PFS Southeast LLC d/b/a Pilot Store #66
c/o CT Corporation System
289 S. Culver Street
Lawrenceville, GA 30046

Eddie Adcock

PLAINTIFF(S)

VS.

Pilot Travel Center, LLC d/b/a Pilot Store #66,
PFS Southeast LLC, d/b/a Pilot Store #66, and
 DEFENDANT(S) Elvis Jones

GARNISHEE

Other attached documents to be served: Summons, Complaint,
Requests for Admissions, Continging Interrogatories,
Request for Production of Documents

SHERIFF'S ENTRY OF SERVICE

I HAVE THIS DAY SERVED THE WITHIN ACTION AND SUMMONS AS FOLLOWS:

[] PERSONAL Upon the following named defendant:

[] NOTORIOUS Upon defendant

By leaving a copy of the action and summons at the most notorious place of abode in the county.

Delivered the same to _____ described as follows: approximate age
 yrs; approximate weight _____ pounds; approximate height _____ feet and _____ inches, domiciled at residence of the defendant.

[X] CORPORATION Upon corporation PFS Southeast LLC

By serving _____, in charge of the office and place of business of the corporation in this county.

By serving Jane Richardson, its registered agent.

[] TACK & MAIL By posting a copy of the same to the door of the premises designated in the affidavit and/or summons, and on the same day of such posting, by depositing a true copy of the same in the United States mail First Class mail, in an envelope properly addressed to the defendant(s) at the address shown in the summons, containing adequate notice to the defendant(s) to answer said summons at the place stated in the summons.

[] NON EST Did not serve because after a diligent search the defendant could not be found in the jurisdiction of the court.

This 15 day of Aug, 2023.

SHERIFF DOCKET _____ PAGE _____

TIME: _____ M.

W. Coberly SO1332
 DEPUTY

Gwinnett County Sheriff's Office

Cover Sheet



Sheriff #: 23026027



Person Served: PFJ SOUTHEAST LLC
289 SOUTH CULVER STREET
C/O REGISTERED AGENT: CT CORPORATION SYSTEM
LAWRENCEVILLE GA 30046
PHONE:

Process Information:

Date Received: 08/14/2023

Assigned Zone: 289 S. Culver

Court Case #: 23-C-05744-S5

Expiration Date:

Hearing Date:

Paper Types: COMPLAINT FOR PERSONAL INJURY

Notes/Alerts:

Notes:

CIVIL ACTION NO. 23-C-05744-S5[] MAGISTRATE [X] STATE [] SUPERIOR - COURT
GWINNETT COUNTY, GEORGIADATE FILED 8/11/2023

ATTORNEY OR PLAINTIFF(S), ADDRESS & TELEPHONE NUMBER

Attorney Personal Injury Attorney, LLC
1120 Maus Hill Road, Suite 8
Watkinsville, GA 30677Attorney Chad Day
NAME, ADDRESS & TELEPHONE # OF PARTY TO BE SERVEDPilot Travel Centers, LLC d/b/a Pilot Store #66
c/o CT Corporation System
289 S. Culver Street
Lawrenceville, GA 30046Eddie Adcock

PLAINTIFF(S)

VS.

Pilot Travel Centers, LLC d/b/a Pilot Store #66,
PJT Southeast LLC, d/b/a Pilot Store #66, and
DEFENDANT(S) Elvis Jones

GARNISHEE

Other attached documents to be served: Summons, Complaint,
Requests for Admissions, Continuing Interrogatories,
Request for Production of Documents

SHERIFF'S ENTRY OF SERVICE

I HAVE THIS DAY SERVED THE WITHIN ACTION AND SUMMONS AS FOLLOWS:

[] PERSONAL Upon the following named defendant:

[] NOTORIOUS Upon defendant _____

By leaving a copy of the action and summons at the most notorious place of abode in the county.

Delivered the same to _____ described as follows: approximate age _____
yrs; approximate weight _____ pounds; approximate height _____ feet and _____ inches, domiciled at residence of the defendant.[X] CORPORATION Upon corporation Pilot Travel Centers LLCBy serving _____ in charge of the office and
place of business of the corporation in this county.By serving Jane Richardson his registered agent.

[] TACK & MAIL By posting a copy of the same to the door of the premises designated in the affidavit and/or summons, and on the same day of such posting, by depositing a true copy of the same in the United States mail First Class mail, in an envelope properly addressed to the defendant(s) at the address shown in the summons, containing adequate notice to the defendant(s) to answer said summons at the place stated in the summons.

[] NON EST Did not serve because after a diligent search the defendant could not be found in the jurisdiction of the court.

This 15 day of Aug, 2023.

SHERIFF DOCKET _____ PAGE _____

W. Coberly Sol332
DEPUTY

TIME: _____ M.

Gwinnett County Sheriff's Office
Cover Sheet



Sheriff #: 23026024



Person Served: PILOT TRAVEL CENTERS LLC
289 South CULVER Street
Lawrenceville GA 30046
PHONE:

Process Information:

Date Received: 08/14/2023
Assigned Zone: 289 S. Culver Court Case #: 23-C-05744-S5
Expiration Date: Hearing Date:
Paper Types: COMPLAINT FOR PERSONAL INJURY
Notes/Alerts:

Notes:

148982

Sheriff's Entry of Service

CASE NUMBER: State Court of Gwinnett County
23-C-05744-SS

GEORGIA. COBB CO.

Eddie Adcock

Plaintiff

Pilot Travel Centers, LLC d/b/a Pilot Store #66,
PJT Southeast LLC, d/b/a Pilot Store #66, and
Elvis Jones

Defendant

Party to be served:

Elvis Jones

1836 Roswell Street SE

Apt. 10401

Smyrna, GA 30080

AFFIDAVIT

Before me, an officer authorized to take acknowledgement in the state and county aforesaid, this date personally appeared _____, a Deputy Sheriff of Cobb County, State of Georgia who, being duly sworn, deposes and says that he is an officer authorized to serve legal process in Cobb County, State of Georgia.

☒ I have this day served _____ personally with a true copy of the within action.

PERSONAL

Elvis Jones

CORPORATE

Served _____, a corporation by _____, a copy of the within action with _____, in charge of the office and place of doing business of said corporation in this county.

NOTORIOUS

I have this day served _____, by leaving a true copy of the action and summons at his/her most notorious place of abode in this county. Delivered in the hands of _____, described as follows: Age, approximately _____ years, weight _____ pounds, about _____ feet and _____ inches tall, domiciled at the residence of the defendant.

DILIGENT SEARCH

Diligent search made and _____ was not found to be in the jurisdiction of this court.

Sworn to and Subscribed before me,
 This _____ day of _____, 2008.

Date: 19 day of Aug, 2008

McAllister

Deputy Sheriff, Affiant
 Cobb County, Georgia

Notary Public

FILED IN OFFICE
 CLERK STATE COURT
 GWINNETT COUNTY, GA
 23 AUG 28 PM 2:23
 TIANA P. GARRETT, CLERK

COBB COUNTY SHERIFF'S OFFICEPUBLIC SAFETY BUILDING • 165 ROSWELL STREET • MARIETTA, GA 30090-9650
TELEPHONE (770) 499-4600 • FAX (770) 499-4797CRAIG D. OWENS, SR.
SHERIFFRHONDA W. ANDERSON
CHIEF DEPUTY

Date: August 25, 2023

Docket/Case # 23-C-05744-55

Civil ID: 148982

Plaintiff Name EDDIE ADCOCK	AFFIDAVIT OF SERVICE SUMMONS & COMPLAINT
Versus	
Served to: JONES, ELVIS J	

I, DEPUTY MCALLISTER, JASMINE, being duly sworn, do certify that on August 19, 2023, I did personally complete service on this case to the defendant named above, by delivering a copy of the action and summons for SUMMONS & COMPLAINT, or that service was not obtained upon the defendant for the reason outlined below:

- ☒ I have personally served the within named defendant:
- ☐ I have served the within named defendant by leaving a copy of the action and summons at their most notorious place of abode in this county, delivered to _____, about _____ years of age.
- ☐ I have served _____, a corporation, by leaving the action and summons with _____, in charge of the business or known as the Registered Agent.
- ☐ I have served the above styled action and summons on the defendant by posting a copy of same to the door of the of the premises designated in said affidavit, and on the same day, depositing a true copy in the U.S. Mail to the defendant at said address.
- ☐ Diligent search made and the defendant, _____ was not found in the jurisdiction of the Court (due to _____).

Associated Fees:

Mileage: \$0.00

Other: \$0.00

Total Fees: \$0.00

McAllister 19066
 Deputy I.D. number
McAllister
 Craig D. Owens Sr., Sheriff
 Cobb County, Georgia